

COPY

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1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MARYLAND

3 WYNDHOLME VILLAGE, LLC, \*

4 et al., \*

5 Plaintiffs and \*

6 Counter-Defendants, \*

7 vs. \*

8 NADIF OF WYNDHOLME, LLC, \*

9 et al., \* CIVIL ACTION NO.:

10 Defendants and \* L01-3809

11 Counter-Plaintiffs \*

12 - - - - -

13

14 Deposition of STEPHEN McBRIDE, taken on

15 Friday, February 28, 2003, beginning at

16 11:00 a.m., at Schulman & Kaufman, 100 North

17 Charles Street, Baltimore, Maryland, before Linda

18 Ann Crockett, a Notary Public.

19

20 Reported by:

21 Linda A. Crockett

COURT REPORTING CONCEPTS, INC.

Baltimore, Maryland

Phone (410) 821-4888 Fax (410) 821-4889

1                   T H E     P R O C E E D I N G S

2                   - - - - -

3                   STIPULATIONS

4       It is stipulated and agreed by and between  
5       counsel for the respective parties that the  
6       reading and signing of this deposition by the  
7       witness is not waived.

8                   - - - - -

9                   STEPHEN MCBRIDE,

10       first duly sworn to tell the truth, the whole  
11       truth, and nothing but the truth, testified as  
12       follows:

13       EXAMINATION BY MR. SCHULMAN:

14               Q.   Mr. McBride, as you're aware, my name is  
15       Howard Schulman. I'm going to ask you a series  
16       of questions. If there's a question that I ask  
17       that you don't understand, tell me and I'll do my  
18       best to make it more intelligible.

19                   First let me get some background  
20       information. Where do you live?

21               A.   My office?

1 Q. And what did he tell you about it?

2 A. Not much. I don't remember.

3 Q. How did it come up?

4 A. I think he had a business card that said  
5 NADIF on it.

6 Q. Who is it that introduced you to Neil  
7 Fisher?

8 A. I believe it was Jack Quinn.

9 MR. SCHULMAN: Let's take a break.

10 (Recess.)

11 (Whereupon, Gotham-Q Venture and  
12 affidavit were marked Deposition Exhibit Number 1  
13 for identification.)

14 BY MR. SCHULMAN:

15 Q. Let me show you what we've marked as  
16 Deposition Exhibit Number 1. Do you recognize  
17 that document?

18 A. Yes.

19 Q. What is it?

20 A. It's two documents. One is the Gotham-Q  
21 Venture, LLC and the second is an affidavit from

1 Neil Fisher.

2 Q. Have you seen the affidavit portion  
3 before?

4 A. Have I seen this affidavit section  
5 before today?

6 Q. Correct.

7 A. Yes.

8 Q. And when did you first see it?

9 A. I'm guessing somewhere around the 19th,  
10 the date that it was signed.

11 Q. And how did you come to see it?

12 A. I believe I received a Fed-Ex copy of it  
13 from Neil Fisher.

14 Q. And did you receive anything else with  
15 the Fed-Ex copy? Was there a cover letter?

16 A. I don't remember a cover letter.

17 Q. Do you know why it was sent to you?

18 A. Because he was working as an agent of  
19 NADIF of Wyndholme.

20 Q. But why would the affidavit be sent to  
21 you as an agent of NADIF of Wyndholme?

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